

School Safety in San Diego County

How Prepared Are We for Another Active School Shooting?

EXECUTIVE SUMMARY

Given the heightened concerns about school shootings and their tragic outcomes, the 2018/2019 San Diego County Grand Jury (Grand Jury) investigated the preparedness of some San Diego County (County) schools to respond to an active shooter situation. County schools, in conjunction with the District Attorney, local law enforcement and other first responders, are giving a high priority to protecting students, faculty and staff on their campuses.

The Grand Jury found this commendable in many respects. At the same time, we identified certain areas where added precautions seem warranted, including making sure all school safety plans emphasize how to best handle active shooter situations. It is imperative that all plans address their unique campuses, buildings and surrounding topography. In addition, they should address campus safety at any hour of the day. We recommend thorough safety assessments, improved communications, training and live drills for all adult workers on campus in options-based response (“Run, Hide, Fight”) techniques, and continued involvement with the community and local agencies, especially in the planning stage of the school safety plan, to lessen or prevent the next possible school-related tragedy.

BACKGROUND

Active shooting situations, although rare, scar the consciousness of both local communities and those across the nation. For this reason alone, they deserve special focus and attention.

In San Diego County, there have been several notable active shooter situations in schools since 2000. On March 5, 2001, two students at Santana High School in Santee were killed and thirteen wounded by a fellow 15-year-old classmate.¹ Several weeks later, an 18-year-old student at Granite Hills High School in El Cajon wounded three students and two teachers.² In September of 2010, two young girls were injured by an adult in a shooting at Kelly Elementary School in Carlsbad.³

The Naval Postgraduate School’s Center for Homeland Defense and Security created a K-12 school shooting database that showed 2018 had the greatest number of incidents since 1970, and that California was one of the top three states for school shootings.⁴ A *Washington Post*

¹ Sullivan Brennan, <https://www.sandiegouniontribune.com/communities/north-county/sd-no-school-security-20161026-story.html> , 2016

² Perry, T. (2001, May 11). Witnesses Recall School Rampage. *Los Angeles Times*

³ Gothold, P. (2018, June 7). We can't predict the next school shooting, but in San Diego County we have a plan. *San Diego Union Tribune*, pp. 1-3.

⁴ *Campus Safety Magazine*. (n.d.). Retrieved from <https://www.campusafetymagazine.com/safety/k-12-school-shooting-statistics-everyone-should-know> .

study completed in 2018 found more than 223,000 American children have witnessed or been victimized by gun violence at school since the Columbine tragedy in 1999.⁵

The Grand Jury looked at school shootings over a six-year period, beginning with the December 2012 shooting at Sandy Hook Elementary in Newtown, CT, which resulted in 27 deaths. These tragedies continued in February 2018 with the 17 deaths that resulted from the shooting rampage at Stoneman Douglas High School in Parkland, FL. Finally, the Grand Jury reviewed the incidents that led to 10 deaths in a school in Santa Fe, TX in May 2018.⁶ The Parkland School incident has drawn criticism about procedural errors and lack of proper response and preparation: a pedestrian gate left unattended, code red alerts not followed, staff unsure about lockdown protocol, and unheeded warnings of the suspect's behavior. Are San Diego County schools any better prepared than Parkland on the issues for which they have drawn criticism?

An injured survivor of the Santa Fe shooting, substitute teacher Flo Rice, has called for national reform on this issue. In an interview with the *Galveston County Daily News*, she described the dilemma facing substitutes, stating that subs were at a loss as to what to do during a shooting, some not even having door keys or knowledge of how to use the school's communications systems. Confusion ensued with the improper action of setting off the fire alarm, which drew students out into hallways and potentially into harm's way. Rice said, "Parents are under the impression that when a substitute is there, their children are equally protected as if a teacher is there, and they're not. They are not safe."⁷ This incident exposed a serious need to train substitutes as well as provide them with the resources to respond properly in such emergencies.

School safety is a highly complex issue to which there is no universal, inexpensive or foolproof solution. Protecting children, teachers and staff members involves considering and planning for several dozen possible crisis scenarios ranging from natural disasters (earthquakes, fires, floods), to accidental injuries and deaths, to power failures, to various serious disturbances, and to life threatening assaults. Although the probability is low for a school shooting to occur, it is imperative that our schools be reasonably prepared for the possibility of such an event.

Legal Basis

California Education Code Section 32281 requires all K-12 schools to develop a Comprehensive School Safety Plan (CSSP), to update it annually and to submit it for School Board approval by March 1 each year. The CSSP also must include "strategies and programs that provide and maintain a high level of school safety" and "a school building disaster plan."⁸ Among other things, these plans require emergency drills and procedures for intruders, weapons and

⁵ Horton, A. (2018, October 29). Database: How many children have experienced school shootings in America. *Washington Post*.

⁶ Kramer, M. a. (2019, Feb 13). Parkland Shooting: Where Gun Control and School Safety Stand Today. *New York Times*.

⁷ Ferguson, J. W. (2018, August 6). *Substitute Hurt in Santa Fe Shooting Calls for More Training*. Retrieved from <https://www.houstonpublicmedia.org/articles/news/2018/08/06/298848> .

⁸ *California Education Code Sections 32282-32289*. (n.d.). Retrieved from <https://www.cde.ca.gov> .

assaults. Response procedures, training for lockdowns and drills for securing the school are the types of details normally included in such plans.⁹ The California Department of Education (CDE) provides a compliance checklist of both required components and suggested details to include in the CSSP.¹⁰ We note that the requirements for charter schools to develop site CSSPs are the same as those for public schools; both must comply with the California Education Code Sections 32280-32289.

Reasons for the Study

A 2013/2014 San Diego County Grand Jury report, “*School Security: There Is No Greater Purpose*”, addressed the issue of targeted violence and ensuring safe schools. It made recommendations for school security plans, training programs, partnerships with public safety officials and law enforcement, improved communications and early reporting of potential incidents.¹¹ Subsequent responses from the districts and the San Diego County Office of Education (SDCOE) indicated that most of these recommendations were being implemented.

The background established in that report is compelling and in agreement with this Grand Jury’s purpose for conducting this investigation. However, this Grand Jury was interested in answering the following:

- *Informed Planning*: Is data collected from more recent shootings across the nation being used to help prevent future active shooter incidents in San Diego County schools?
- *Coordinated Responsibility*: Is the CSSP being developed at the local level with multi-disciplinary partners (as intended by the law) to achieve community coordination of resources for crisis support?
- *Specific Guidelines*: Are the school safety plans itemized and detailed about procedures to handle intruders, weapons and assault and do they include active shooters?
- *Current Training*: Are all the personnel who have responsibility for student welfare being prepared with the best strategies to respond to a school shooting?
- *Targeted Improvements*: Are identified weaknesses, in the infrastructure (buildings, equipment) and support (staff and first responders) being addressed in the development of the school’s safety plan?
- *Fiscal Commitment*: Are the increasing budgetary challenges, which exist for all districts, affecting the immediate implementation of identified safety measures?

Given the recent history of mass shootings and subsequent development of prevention programs, it is imperative that San Diegans remain watchful and prepared, even if the likelihood of such a tragedy is slim. Bob Mueller, Executive Director of Student

⁹ California Education Code Sections 32282-32289. (n.d.). Retrieved from <https://www.cde.ca.gov>.

¹⁰ <https://www.cde.ca.gov>. (n.d.). Retrieved January 7, 2019, from Compliance Checklist for a Comprehensive School Safety Plan

¹¹ GJReport. (n.d.). *School Security: There Is No Greater Purpose*. San Diego: San Diego County Grand Jury 2013/2014

Services/Programs for the SDCOE, recently stated at a Rancho Penasquitos forum on preventing school assaults, “It’s highly unlikely (that it will happen here), but it’s absolutely certain it will happen somewhere. We shouldn’t live in fear that it’s going to happen, but we need to take reasonable action to be ready.”¹²

The Grand Jury wants to emphasize that this type of training can also last a lifetime. It can help save lives years later, by conditioning us all on how to respond quickly to an active shooter when there is ever a need.

METHODOLOGY

The Grand Jury gathered the information for this report from multiple sources:

- A review of local/national news stories over several years, past Grand Jury reports in San Diego and other California counties, and training videos of school violence prevention
- A presentation from the San Diego County District Attorney’s office
- Review of school safety materials and procedures (including those developed by Sandy Hook Promise, the FBI, the Secret Service and the San Diego County April 2018 School Safety Summit)
- Review of safety plans for San Diego County school districts
- One day observing safety measures at several schools
- Attendance at “Run, Hide, Fight” training for San Diego school district personnel

Additionally, the Grand Jury interviewed:

- County Office of Education representatives
- School security officers
- Representatives from San Diego School districts and other personnel with responsibility for school safety

DISCUSSION

Learning from Past Experience

Sandy Hook Promise, a national non-profit organization, now provides materials on policies and procedures that are being widely adopted by school districts nationwide. In addition, many highly qualified and credible organizations have studied the problems of school safety and have offered many viable protocols, including the FBI, the Secret Service, the State of Virginia, and the U.S. Department of Education.¹³

Applying Best Strategies Available

School safety involves four distinct phases:

¹² Sullivan-Brennan, D. (2018, March 8). Schools take aim at campus shootings. *San Diego Union Tribune*.

¹³ (2013). *Guide for Developing High-Quality School Emergency Operations Plans*. Washington, DC: U.S. Department of Education

1. Mitigation (up-front awareness and avoidance)
2. Preparedness
3. Response
4. Recovery

Many districts approach **mitigation** by promoting new telephone tip-lines and tip apps for school threats or incidents.¹⁴ Students, parents, and others are encouraged to “speak out without fear when they see something concerning.”¹⁵ They are provided with free phone apps such as “WeTip” for easy access and convenience. Active prevention programs involving mental health clinicians, working to build a positive school climate and developing support systems focused on communications and interaction of staff/students are crucial building blocks for a safer campus.

Preparedness is often addressed through developing site security measures, evaluating school resources, assessing infrastructure improvements for a safer environment and conducting repeated drills. Schools that evaluate their premises using a vulnerability study take an important first step in the possible prevention of school shootings. Some San Diego schools have conducted vulnerability studies of their premises and others have enlisted the help of local law enforcement to develop and critique plans. It should be noted here that not all methods of preparedness are expensive.

The **response** phase involves putting the plan into action by adopting and practicing approaches to active shooter scenarios. Along with traditional lockdown barricading, many school districts throughout the U.S. are learning the system developed by the Department of Homeland Security called “*options-based response*” and generally referred to as “Run, Hide, Fight”.¹⁶

Lastly, the **recovery** phase refers to all the activities needed after the emergency to restore some sense of normalcy and safety to the school and community. The impact of school shootings goes far beyond those who are killed or injured and leaves deep and lasting emotional scars throughout a community or, indeed, throughout the nation. As Dr. Gothold, SDCOE Superintendent, wrote in the *San Diego Union Tribune*, “...in the event that a tragedy should occur, schools and districts are prepared to provide mental health and crisis support.” The combined phases of emergency management require schools to involve as many stakeholders as possible and to seek out effective leadership and counseling.

This need is all the more evident as we continue to study the aftermath of past tragedies. As of March 2019, when this report was written, two Parkland students who survived the shooting had committed suicide. Days later, the father of one of the 2012 Sandy Hook victims also

¹⁴ Sullivan-Brennan, D. (2018, March 8). Schools take aim at campus shootings. *San Diego Union Tribune*

¹⁵ Gothold, P. (2018, June 7). We can't predict the next school shooting, but in San Diego County we have a plan. *San Diego Union Tribune*, pp. 1-3.

¹⁶ Sullivan Brennan, D. (2016, October 29). <https://www.sandiegouniontribune.com/communities/north-county/sd-no-school-security-20161026-story.html> . Retrieved from Educators taught to "Run, Hide, Fight"

committed suicide. Clearly, the recovery phase is very important and demands added attention.

San Diego County has taken the initiative to help improve school safety. A local school safety summit was held at Liberty Station on April 27, 2018 under the leadership of SDCOE and the San Diego County District Attorney's office. Key participants were mainly senior school administrators, law enforcement leaders and mental health professionals. Attendees focused on developing a uniform school safety protocol for the entire County to reduce the risk of targeted violence in County schools. Subsequently, the SDCOE now provides a "train the trainers" program, where school district representatives are trained in the latest safety measures and how to teach these to others back in their districts. Similarly, other school districts followed suit and started holding school safety community forums.

"Active Shooter" Response in Safety Plans

In its reminder letter to all school districts, the CDE stated:

Effective January 1, 2019, Assembly Bill 1747 (Rodriguez), School Safety Plans, became law. This additional legislation requires that during the writing and development of the comprehensive school safety plan (CSSP), the school site council or safety committee consult with a fire department and other first responder entities in addition to currently required entities. It requires the CSSP, and any updates made to the plan, to be shared with law enforcement agencies, the fire department, and the other first responder entities. This bill requires the CSSP to also include procedures for conducting tactical responses to criminal incidents.¹⁷

The community should expect schools in San Diego County to be conducting planning sessions within their School Site Councils (SSC) to explore and incorporate the latest learning from active shooter situations into their annual CSSPs.

Schools must also develop a site Emergency Operations Plan (EOP) covering emergency response procedures, disaster preparedness and detailed instructions for responsible individuals. The United States Departments of Education, Health and Human Services, Homeland Security, Justice, FBI and FEMA jointly published a federal guide that schools have found to be useful.¹⁸ Some existing EOPs are custom plans while others follow a Standardized Emergency Management System (SEMS) format outlined by the State. In its guidance materials for writing an effective plan, the CDE states, "School EOPs should include courses of action that will describe how students and staff can most effectively respond to an *active shooter situation* to minimize the loss of life, and teach and train on these practices, as deemed appropriate by the school."

¹⁷ Torlakson, S. (2019, January 3). *CDE Newsroom*. Retrieved from www.cde.ca.gov .

¹⁸ (2013). *Guide for Developing High-Quality School Emergency Operations Plans*. Washington, DC: U.S. Department of Education.

Some of the CSSPs reviewed had information for responding specifically to an active shooter on campus. The Grand Jury believes that *all* San Diego County CSSPs should give “active shooter” preparation the same focus as any major- catastrophe, like “fires” or “earthquakes”. In addition, these sections should regularly incorporate lessons learned from tragedies elsewhere, which is widely circulated.

This topic deserves individual attention due to its potentially horrific magnitude. These CSSPs, along with the accompanying EOPs, should be updated to require active shooter training and drills for all teachers and staff. Additionally, involvement of students in “age-appropriate” training contributes to their likelihood of surviving a domestic assault at school.

The Grand Jury hopes that all schools are voluntarily conducting drills that help staff and students develop a mindset for immediate emergency response. The Grand Jury found that all of the school sites reviewed either had conducted some form of drills or were planning them.

Creating Multi-disciplinary Partnerships

To be functional, the CSSP requires a basis in shared protocol, partnership initiatives, and infrastructure initiatives. The Center for Readiness and Emergency Management for Schools suggests assembling an emergency planning team comprised of all key stakeholders, including various school departments, student and family representatives, individuals and organizations that serve and represent the interests of students, staff, and those with disabilities or functional needs. Additionally, the planning team should include law enforcement officers, fire department officials, local emergency managers, first responders and mental health practitioners. It takes the collaboration of many different individuals to tackle the problem of school safety, specifically preparation for an active shooter situation. Each school is unique and a reflection of its community. CSSPs and EOPs should all be designed to be the product of multi-disciplinary partnerships that are formed through local agreements. What works in one location may or may not work in another. The expertise of school and community partners can customize and direct implementation of the plan.

In reviewing the safety plans for the selected schools, the Grand Jury checked for evidence of key stakeholders’ representation in the development of the plan, including employees, first responders, parents and students. Furthermore, the Grand Jury sought evidence of participants’ involvement with the training and practice required by the plan. Multi-disciplinary teams, with varying levels of support from community partners, created all the plans reviewed. At best, there were collaborative school level meetings with a cross-representation of stakeholders, and at worst, there were safety plans fully written at the district level with fill-in the blanks for local participants, followed by a review and sign-off at the school level.

The Grand Jury saw written annual comprehensive plans that referenced the requirements for staff training and practice drills. School districts with more thoroughly developed preparations reported the use of simulations training, not just presentations and/or desktop instruction. The current recommended focus, as written in the 2018 California Office of Emergency Services

“Active Shooter Awareness Guide”, is to teach options-based training/responses (“Run, Hide, Fight”) at age-appropriate campuses.

Communication is a key element of such emergency response plans. While some schools have evolved further in response training, others have not yet considered going beyond lockdown training and conducting an active shooter drill. However, all reviewed schools meet compliance minimums by having safety plans and established procedures for an emergency alert.

Moving Toward Safer Schools

In conducting this investigation, the Grand Jury was encouraged by the efforts of all the school districts studied to address school safety.

In addition, the SDCOE has taken a strong leadership role in helping districts to assess their environment, to understand the approaches for addressing active shooter situations and to train their staffs to handle these emergencies. It is evident that San Diego schools are learning from the past years of national experience and listening to experts who are providing ideas for prevention and response. One district, Sweetwater Union High School District, was publicly recognized for establishing a common vision for campus safety and using highly researched protocols.

Any school benefits when all adults on its campus receive safety training . Similarly, all schools benefit when this training is applied 24/7, covering even those periods outside of traditional school hours. The Grand Jury suggests that all districts take a close look at their existing protocols for ensuring safety during their before and after school activities, including access to the safety plans of external programs operating on their sites. More time should be spent discussing individual security issues for these activities, including the allotment of resources to strengthen the safety of students, temporary staff, volunteers, and others. Each district needs to minimize catastrophe from active shooter incidents by developing plans that are specific to their sites and extracurricular activities, and then sharing and practicing those plans with all participants.

Meeting Fiscal Obligations

The availability of funding for improved safety measures and infrastructure was considered in the development of this Grand Jury report. There are numerous competing interests for what seems like a forever-shrinking budget for California schools. However, the provision of a safe environment is a necessity for all of our educational institutions. Each district goes through a prioritization process as it plans to provide campus security and safety. Recent press reports of some districts in San Diego County reveal that school security projects are being given heightened attention and monetary support. For example, it was reported that the San Diego Unified School District’s (SDUSD) board prioritizes projects aimed at increasing security using voter-approved bond money. Samer Naji, a SDUSD spokesperson, was quoted as saying, “It’s around \$250 million. It’s a substantial investment in school security; that’s our biggest

priority.”¹⁹ The news report also stated, “In light of recent school shootings around the country, the district first wants to turn their attention to school safety projects, like adding perimeter fencing to campuses, security cameras, and emergency communications systems.”²⁰

Some districts are facing more funding challenges than others, trying to balance safety measures with dwindling financial reserves or even deficits. In these cases, funds are not being earmarked for all the projects suggested in safety audits, or some projects are being stretched over multiple years. For example, San Dieguito Union School District is using Torrey Pines High School as a pilot for a specialized camera security system, and evaluating its effectiveness, before possibly deploying the project out to other sites. Special taxes, like Mello Roos funds, are being tapped for some security projects.²¹ Even cash-strapped districts recognize the elevated need for school site security and are finding ways to meet their fiscal obligations to improve the safety and security of staff and students. The Grand Jury encourages all districts to commit funding in their budgets to handle an active shooter crisis as a matter of priority. As we have stressed, these threats leave scars like no others.

FINDINGS

Finding 01: Overall, the San Diego County schools studied are prepared to handle many kinds of emergencies, including active shooter situations, due largely to mandates from the State.

Finding 02: Overall, law enforcement, first responders, parents and other stakeholders have shown interest to work cooperatively with the San Diego County school studied in the prevention of a possible active school shooter incident.

Finding 03: At the school site level, there appears to be some lack of interactive collaboration with community stakeholders on the actual development of the plans.

Finding 04: The Grand Jury found that some of the schools reviewed had conducted a vulnerability study of their premises.

Finding 05: Valuable learning from the recent Florida and Texas shootings is not fully reflected yet in the existing CSSPs.

Finding 06: Overall, school districts in San Diego County indicated a more focused approach to active shooter response through their efforts to improve communication, add site safety

¹⁹ Pura, A. (2018, December 5). *San Diego Unified School District prioritizes security projects in massive spending plan*. Retrieved from <https://www.10news.com/new/local-news/san-diego-unified-school-district-prioritizes-security-projects-in-massive-spending-plan>

²⁰ Pura, A. (2018, December 5). *San Diego Unified School District prioritizes security projects in massive spending plan*. Retrieved from <https://www.10news.com/new/local-news/san-diego-unified-school-district-prioritizes-security-projects-in-massive-spending-plan>

²¹ Billing, K. (2018, June 25). *San Dieguito projects \$3.7 million deficit in 2018-19 school year budget*. Retrieved from <https://www.delmartimes.net/news/sd-cm-nc-sandieguitobudget-20180622-htmlstory.html> .

precautions and adopt guidelines for Options-Based Responses in this year's or next year's Comprehensive School Safety Plans/Emergency Operations Plans.

Finding 07: All San Diego County schools in the Grand Jury study claimed to have conducted or have scheduled drills within the current school year on emergency procedures directed towards intruders on campus, but not specifically armed assailants.

Finding 08: Drills (conducted or planned) center mainly on the presentation of procedures but are progressing toward becoming more realistic and dynamic, which helps create a "mental model" for preconditioning staff and students to act with immediacy.

Finding 09: As a note of recognition, Sweetwater Union High School District has gone above and beyond state requirements for safety training by demonstrating excellent and thorough levels of preparation.

Finding 10: Funding for active shooter response and preparedness is given high priority in some districts.

Finding 11: Before and after school programs need to be better addressed in safety plans.

Finding 12: Many districts expressed a need to train all adults on campus in safety procedures.

RECOMMENDATIONS

The 2018/2019 San Diego County Grand Jury recommends that by March 1, 2020 (the date finalized plans for the subsequent school year are due to the SDCOE) Bonsall Union Elementary School District, Cajon Valley Union School District, Carlsbad Unified School District, Chula Vista Elementary School District, Escondido Union School District, Rancho Santa Fe Elementary School District, San Dieguito Union High School District, San Marcos Union School District, San Ysidro Elementary School District, San Diego Unified School District and Sweetwater Union High School District:

- 19-01:** Increase the priority of funding in school budgets for training, equipment and infrastructure improvements to handle an active shooter crisis as a matter of security for staff and student safety.
- 19-02:** Explore alternate or creative sources of funding to supplement the school's needs to enhance safety measures regarding active shooter situations, including possible grants or community fund-raising efforts.
- 19-03:** Conduct vulnerability studies at all school sites and use this data to guide the development of the CSSP and EOP.

- 19-04:** Provide more safety precautions against active shooters, including threat awareness training/reporting, and site physical improvements.
- 19-05:** Monitor individual school's planning meetings to develop the CSSP and EOP to ensure collaboration of multi-disciplinary partners (staff, parents, students, first responders, fire department and law enforcement, community agencies) at the *local school level*.
- 19-06:** Include "Active Shooter" response language in the school's Comprehensive School Site Plan and dedicated sections in the Emergency Operations Plans.
- 19-07:** Promote the use of tip hotlines and tip apps by students and parents.
- 19-08:** Include substitute teachers and all other adult workers in the training and practice provided to regular staff on active shooter awareness and responses specific to each school.
- 19-09:** Conduct active shooter drills with staff that are dynamic and produce "immediacy" of response consistent with the school's approved safety plan.
- 19-10:** Use age-appropriate training methods in conducting lockdown and active shooter drills with students.
- 19-11:** Coordinate detailed emergency plans for school programs held on campus outside of normal school hours, inform all participants and involve the community's support.

REQUIREMENTS AND INSTRUCTIONS

The California Penal Code §933(c) requires any public agency which the Grand Jury has reviewed, and about which it has issued a final report, to comment to the Presiding Judge of the Superior Court on the findings and recommendations pertaining to matters under the control of the agency. Such comment shall be made *no later than 90 days* after the Grand Jury publishes its report (filed with the Clerk of the Court); except that in the case of a report containing findings and recommendations pertaining to a department or agency headed by an elected County official (e.g. District Attorney, Sheriff, etc.), such comment shall be made *within 60 days* to the Presiding Judge with an information copy sent to the Board of Supervisors.

Furthermore, California Penal Code §933.05(a), (b), (c), details, as follows, the manner in which such comment(s) are to be made:

- (a) As to each grand jury finding, the responding person or entity shall indicate one of the following:
 - (1) The respondent agrees with the finding

- (2) The respondent disagrees wholly or partially with the finding, in which case the response shall specify the portion of the finding that is disputed and shall include an explanation of the reasons therefor.
- (b) As to each grand jury recommendation, the responding person or entity shall report one of the following actions:
 - (1) The recommendation has been implemented, with a summary regarding the implemented action.
 - (2) The recommendation has not yet been implemented, but will be implemented in the future, with a time frame for implementation.
 - (3) The recommendation requires further analysis, with an explanation and the scope and parameters of an analysis or study, and a time frame for the matter to be prepared for discussion by the officer or head of the agency or department being investigated or reviewed, including the governing body of the public agency when applicable. This time frame shall not exceed six months from the date of publication of the grand jury report.
 - (4) The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation therefor.
- (c) If a finding or recommendation of the grand jury addresses budgetary or personnel matters of a county agency or department headed by an elected officer, both the agency or department head and the Board of Supervisors shall respond if requested by the grand jury, but the response of the Board of Supervisors shall address only those budgetary or personnel matters over which it has some decision making authority. The response of the elected agency or department head shall address all aspects of the findings or recommendations affecting his or her agency or department.

Comments to the Presiding Judge of the Superior Court in compliance with the Penal Code §933.05 are required from the:

Responding Agency	Recommendations	Date
Bonsall Union Elementary School District	19-01 through 19-11	8/12/19
Cajon Valley Union School District	19-01 through 19-11	8/12/19
Carlsbad Unified School District	19-01 through 19-11	8/12/19
Chula Vista Elementary School District	19-01 through 19-11	8/12/19
Escondido Union School District	19-01 through 19-11	8/12/19

Rancho Santa Fe Elementary School District	19-05 through 19-11	8/12/19
San Dieguito Union High School District	19-01 through 19-11	8/12/19
San Marcos Union School District	19-01 through 19-11	8/12/19
San Ysidro Elementary School District	19-01 through 19-11	8/12/19
San Diego Unified School District	19-01 through 19-11	8/12/19
Sweetwater Union High School	19-01 through 19-11	8/12/19

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